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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER CONTINUING DEADLINES FOR  
GOOGLE'S PRESERVATION MOTION**

Judge: Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between  
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on October 27, 2022 Google filed a motion seeking relief from the Court’s  
4 preservation order (Dkt. 782, “Preservation Motion”);

5 WHEREAS, Plaintiffs’ response to Google’s Preservation Motion is currently due on  
6 November 10, 2022;

7 WHEREAS, Google’s reply in support of its Preservation Motion is currently due on  
8 November 17, 2022;

9 WHEREAS, in the related case *Calhoun v. Google, LLC*, No. 4:20-cv-05146-YGR (N.D.  
10 Cal.) (“*Calhoun*”), Google filed a motion seeking similar relief from the Court’s preservation order  
11 in that case;

12 WHEREAS, in the related case *Calhoun*, the *Calhoun* plaintiffs and Google reached an  
13 agreement to modify the briefing schedule for the motion in that case;

14 WHEREAS, in the related case *Calhoun*, the Court adopted the *Calhoun* parties’ agreement  
15 to modify the briefing schedule for the motion in that case, and set the motion hearing for January  
16 10, 2023;

17 WHEREAS, the Parties here have reached agreement on a similar briefing schedule;

18 NOW THEREFORE, the Parties stipulate to the following revised schedule regarding  
19 certain discovery and class certification deadlines.

- 20 1. The deadline for Plaintiffs’ Opposition to Google’s Preservation Motion is extended  
21 from November 10, 2022 to December 1, 2022.
  - 22 2. The deadline for Google’s Reply in support of the Preservation Motion is extended from  
23 November 17, 2022 to December 15, 2022.
  - 24 3. The hearing for Google’s Preservation Motion is continued to January 10, 2023.
- 25  
26  
27  
28

1 DATED: November 9, 2022

2 QUINN EMANUEL URQUHART &  
3 SULLIVAN, LLP

4 /s/ Andrew H. Schapiro

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this Joint Discovery Statement. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: November 9, 2022

By John A. Yanchunis

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER**

Judge: Honorable Susan van Keulen

Pursuant to stipulation of the Parties, the Court revises the case schedule as follows:

| Scheduled Event                                           | Current Date      | New Date          |
|-----------------------------------------------------------|-------------------|-------------------|
| Plaintiffs' Opposition to<br>Google's Preservation Motion | November 10, 2022 | December 1, 2022  |
| Google's Reply in Support of<br>its Preservation Motion   | November 17, 2022 | December 15, 2022 |
| Hearing on Google's<br>Preservation Motion                | December 13, 2022 | January 10, 2023  |

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2022

\_\_\_\_\_  
Hon. Susan van Keulen  
United States Magistrate Judge